

Marc V. Kalagian
Attorney at Law: 4460
Law Offices of Rohlfing & Kalagian, LLP
211 East Ocean Boulevard, Suite 420
Long Beach, CA 90802
Tel.: (562)437-7006
Fax: (562)432-2935
E-mail rohlfig.kalagian@rksslaw.com

Attorneys for Plaintiff
TONI M. GOODHALL, as Guardian ad Litem for D.D.B.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TONI M. GOODHALL, as Guardian ad Litem for D.D.B.,)	Case No.: 2:14-cv-01263-JAD-PAL
)	
Plaintiff,)	STIPULATION TO EXTEND
)	BRIEFING SCHEDULE (Second
vs.)	Request)
)	
CAROLYN W. COLVIN, Acting)	
)	
Commissioner of Social Security,)	
)	
Defendant)	

Plaintiff Toni M. Goodall, as Guardian ad Litem for D.D.B. (“Plaintiff”) and defendant Carolyn Colvin, Commissioner of Social Security (“Defendant”), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to June 8, 2015; and that Defendant shall have until July 13, 2015, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due July 23, 2015.

1 A second extension of time is needed because Plaintiff's Counsel's Spouse
2 undergoes chemotherapy treatment for her Stage IV breast cancer which
3 metastasized initially to her liver and continues to progress there and in her lungs,
4 throat, and spine which required recent hospitalization to treat. Counsel requires the
5 additional time to file the Joint Stipulation to allow him to devote the appropriate
6 time to assist his Spouse and his two elementary school aged children through this
7 obviously stressful experience. Counsel sincerely apologizes to the court for any
8 inconvenience this may have had upon it or its staff. This request is made at the
9 request of Plaintiff's counsel to allow additional time to fully research the issues
10 presented.

11
12 DATE: May 7, 2015,

Respectfully submitted,

13 ROHLFING & KALAGIAN, LLP

14 /s/ *Marc V. Kalagian*

15 BY: _____
16 Marc V. Kalagian
Attorney for plaintiff

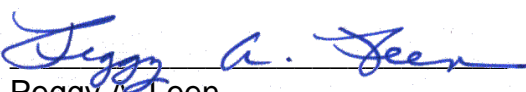
17 DATED: May 7, 2015

Daniel G. Bogden
United States Attorney

18
19 */S/ Jeffrey T. Chen

Jeffrey T. Chen
Special Assistant United States Attorney
Attorney for Defendant
[*Via email authorization]

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23 IT IS SO ORDERED this 8th day
24 of May, 2015.

25 
26 Peggy A. Leen
United States Magistrate Judge